

Shannon L. Gustafson (SBN 228856)  
[sgustafson@lynberg.com](mailto:sgustafson@lynberg.com)  
Amy R. Margolies (SBN 283471)  
[amargolies@lynberg.com](mailto:amargolies@lynberg.com)  
**LYNBERG & WATKINS**  
A Professional Corporation  
1100 W. Town & Country Road, Suite #1450  
Orange, California 92868  
(714) 937-1010 Telephone  
(714) 937-1003 Facsimile

Attorneys for Defendants, COUNTY OF SAN BERNARDINO,  
ROBERT VACCARI and JAKE ADAMS

**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**

JONATHAN WAYNE BOTTEN, SR.;  
TANJA DUDEK-BOTTEN;  
ANNABELLE BOTTEN; and J.B., a  
minor by and through his guardian  
JONATHAN WAYNE BOTTEN, SR.,

Plaintiffs,

vs.

STATE OF CALIFORNIA; COUNTY  
OF SAN BERNARDINO; ISAIAH  
KEE; MICHAEL BLACWOOD;  
BERNARDO RUBALCAVA;  
ROBERT VACCARI; JAKE ADAMS;  
and DOES 1-10 inclusive,

Defendants.

CASE NO. 5:23-cv-00257-KK-(SHKx)

*Assigned for All Purposes to:*  
*Hon. Kenly Kiya Kato– Courtroom #3*

**JOINT STIPULATION FOR  
DISMISSAL WITH PREJUDICE**

**[Fed. R. Civ. P. 41(a)(1)(A)(ii)]**

*Trial: July 28, 2025*

*Complaint filed: 02/16/23*  
*FAC filed: 06/08/23*

**TO THE HONORABLE COURT:**

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), the undersigned  
counsel for all parties who have appeared in this case hereby stipulate to the  
dismissal of Defendants, COUNTY OF SAN BERNARDINO, ROBERT  
VACCARI and JAKE ADAMS only, in the above-captioned action, with prejudice.  
Each side is to bear its own fees and costs incurred in this matter. This stipulation

1 does not affect the claims against Defendants Isaiah Kee and Bernardo Rubalcava.

2 **IT IS SO STIPULATED.**

3 Pursuant to Local Rule 5-4.3.4(a)(2)(i), the filer of this Stipulation attests that  
4 all other signatories listed, and on whose behalf the filing is submitted, concur in the  
5 filing's content and have authorized the filing.

6  
7 DATED: July 9, 2025

**LYNBERG & WATKINS**  
A Professional Corporation

8  
9 By: /s/ Amy R. Margolies  
10 **Shannon L. Gustafson**  
11 **Amy R. Margolies**  
12 Attorneys for Defendants,  
COUNTY OF SAN BERNARDINO,  
ROBERT VACCARI and JAKE ADAMS

13 DATED: July 9, 2025

**LAW OFFICES OF DALE K. GALIPO**

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16 By /s/ Hang D. Le  
17 **Dale K. Galipo**  
18 **Hang D. Le**  
Attorneys for Plaintiffs

19 \*The filer, Amy R. Margolies, hereby attests that all other signatories listed,  
20 and on whose behalf the filing is submitted, concur with the filing's content, and  
21 have authorized.

22 DATED: July 9, 2025

**LYNBERG & WATKINS**  
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23  
24  
25 By: /s/ Amy R. Margolies  
26 **Shannon L. Gustafson**  
27 **Amy R. Margolies**  
Attorneys for Defendants,  
COUNTY OF SAN BERNARDINO,  
ROBERT VACCARI and JAKE ADAMS